

**DEPARTMENT OF COMMERCE AND
ECONOMIC DEVELOPMENT**

ALASKA PUBLIC UTILITIES COMMISSION

September 26, 1995

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SEP 27 1995

FCC MAIL ROOM

Mr. William F. Caton
Acting Secretary
Federal Communications Commission
1919 M Street, N.W.
Washington, D.C. 20554

DOCKET FILE COPY ORIGINAL

Re: CC Docket No. 95-115

Dear Mr. Caton:

Enclosed are an original and nine copies of the Comments of the Alaska Public Utilities Commission in response to the Federal Communications Commission's Notice of Proposed Rulemaking in CC Docket No. 95-115 seeking comments on methods to increase subscribership and usage of the public switched network. Please ensure that each Commissioner receives a personal copy of these comments.

Sincerely,



Don Schröer, Commissioner
Chairman
ALASKA PUBLIC UTILITIES COMMISSION

Enclosure

No. of Copies rec'd 029
List ABCDE

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

FCC MAIL ROOM

In the Matter of)
)
Amendment of the Commission's) CC Docket No. 95-115
Rules and Policies to Increase)
Subscribership and Usage of the)
Public Switched Network)

Comments of the

DOCKET FILE COPY ORIGINAL

Alaska Public Utilities Commission

On July 20, 1995, the Federal Communications Commission (FCC), released a Notice of Proposed Rulemaking (NPRM) in CC Docket No. 95-115 seeking comments on methods to increase subscribership and usage of the public switched network. The Alaska Public Utilities Commission (APUC) commends and welcomes the FCC's efforts in this matter. As many Alaskan locations have subscribership levels well below 70 percent, with some locations under 25 percent, the APUC is very interested in proposed methods to improve subscribership.

The APUC requests that the FCC not assume that a policy that may have worked effectively in several, more urban, states will cure the low subscribership levels experienced in some of the more rural states. No statewide study has ever been performed to ascertain why subscribership in Alaska is low, but the APUC's experience would suggest that the problem is complex in nature. Thus, it is not known whether methods that have worked well elsewhere will be effective in Alaska.

While the APUC supports any and all reasonable methods to promote subscribership, it requests that the FCC not eliminate existing support mechanisms such as the Universal Service Fund (USF) and Dial Equipment Minutes (DEM) weighting on the assumption that the several targeted approaches suggested in the NPRM will be sufficient, in and of themselves, to ensure universal service. Alaska is highly dependent on the USF/DEM support to ensure that rates remain affordable. Without this support, some phone rates in Alaska could rise by over \$50 per month, compromising the universal service goal even if those targeted approaches identified in the NPRM were to be implemented.

RESPECTFULLY SUBMITTED this 26th day of September, 1995.

BY DIRECTION OF THE COMMISSION

Sincerely,

ALASKA PUBLIC UTILITIES COMMISSION



By: Don Schröer, Commissioner
Chairman, Alaska Public
Utilities Commission
1016 West Sixth Avenue, Suite 300
Anchorage, Alaska 99501
1-907-276-6222

cc: William F. Caton, Acting Secretary
Federal Communications Commission

Attached List

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of)
)
Amendment of the Commission's) CC Docket No. 95-115
Rules and Policies to Increase)
Subscribership and Usage of the)
Public Switched Network)

CERTIFICATION OF MAILING

I, Joyce McGowan, certify as follows:

I am Administrative Clerk II in the offices of the
Alaska Public Utilities Commission, 1016 West Sixth Avenue,
Suite 400, Anchorage, Alaska 99501.

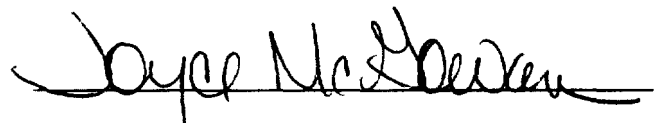
On September 26, 1995, I mailed copies of

Comments of the

Alaska Public Utilities Commission
(Issued September 26, 1995)

in the proceeding identified above to the persons indicated on the
attached service list.

DATED at Anchorage, Alaska, this 26th day of September, 1995.



SERVICE LIST
CC Docket No. 95-115

September 26, 1995
Page 1 of 5

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SERVICE LIST (CONTINUED)
CC Docket No. 95-115

September 26, 1995
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